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12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA  
16 Plaintiff,  
17 v.  
18 \$45,357.00 IN U.S. CURRENCY,  
19 Defendant.  
20

No. CV 15-09989

**VERIFIED COMPLAINT FOR FORFEITURE**

21 U.S.C. § 881(a)(6)

[D.E.A.]

22 For its claim against the defendant currency, described  
23 more particularly below, the United States of America alleges:

24 JURISDICTION AND VENUE

25 1. This is a civil forfeiture action brought pursuant to  
26 21 U.S.C. § 881(a)(6).

27 2. This court has jurisdiction over the matter pursuant  
28 to 28 U.S.C. §§ 1345 and 1355.

1           3.    Venue lies in this district pursuant to 28 U.S.C.  
2   § 1395(b).

3                               PERSONS AND ENTITIES

4           4.    The plaintiff is the United States of America.

5           5.    The defendant is \$45,357.00 in United States currency  
6 (the "defendant currency"). The defendant currency was seized  
7 from a residence in Los Angeles, California<sup>1</sup> on April 14, 2015,  
8 during the execution of a State of California search warrant by  
9 Drug Enforcement Administration ("D.E.A.") agents and Montebello  
10 Police Department ("M.P.D.") officers.

11          6.    The defendant currency is currently in the custody of  
12 the United States Marshals Service in this District, where it  
13 shall remain subject to this court's jurisdiction during the  
14 pendency of this action.

15          7.    The interests of Rodney Millar ("Millar") and Natalie  
16 Sookuen Chan Sun ("Sun") may be adversely affected by these  
17 proceedings.

18                               EVIDENCE SUPPORTING FORFEITURE

19          8.    As part of an investigation into the sale and  
20 distribution of heroin and cocaine in Los Angeles, D.E.A. agents  
21 and M.P.D. officers initiated surveillance of Juan Verduga Plaza  
22 ("Plaza") and Fabricio Aguilar ("Aguilar") on April 14, 2015.

23          9.    The investigators observed Plaza and Aguilar enter a  
24 Chevrolet Camaro in the vicinity of Broden Street in Anaheim,  
25 California, and drive the vehicle to a residence located in Los  
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27 <sup>1</sup>Pursuant to Local Rule 5.2-1, only the city and state of the  
28 residence is listed.

1 Angeles, California (the "Los Angeles Residence"), arriving at  
2 approximately 1:50 p.m. Aguilar then opened the trunk of the  
3 vehicle, removed a large duffle bag that appeared to be heavy,  
4 and carried the duffle bag into the Los Angeles Residence.

5 10. At approximately 2:15 p.m., someone traveling in a  
6 large white van drove the vehicle up the driveway of the Los  
7 Angeles Residence. An unidentified male exited the van and  
8 walked into the Los Angeles Residence carrying a large plastic  
9 garbage bag that appeared to be heavy. A few minutes later the  
10 unidentified male returned to the van carrying a small plastic  
11 bag, and drove the van away from the Los Angeles Residence.

12 11. At approximately 2:20 p.m., Aguilar walked out of the  
13 Los Angeles Residence and returned to the Camaro while carrying  
14 a large duffle bag and a smaller bag. The Camaro then departed  
15 the Los Angeles Residence and was driven to a residence located  
16 in Garden Grove, California (the "Garden Grove Residence").  
17 Upon arrival at the Garden Grove Residence, Aguilar opened the  
18 trunk of the Camaro, appeared to grab something out of the  
19 trunk, and entered the Garden Grove Residence.

20 12. At approximately 5:20 p.m., while Aguilar was still  
21 inside the Garden Grove Residence, someone traveling in a  
22 Volkswagen Passat drove the vehicle into the driveway of the  
23 Garden Grove Residence. A female later identified as Genisa  
24 Iglesias ("Iglesias") entered the Garden Grove Residence,  
25 emerged a few minutes later, and drove away in the Passat.

26 13. At approximately 6:55 p.m. a California Highway Patrol  
27 officer stopped the Passat on Harbor Boulevard in Garden Grove  
28 for a traffic violation. During the traffic stop a trained

1 narcotics detection canine alerted to (A) a duffle bag located  
2 in the trunk of the Passat; and (B) interior panels of the  
3 Passat. \$352,729.00 in U.S. Currency was seized from the  
4 interior of the Passat. Iglesias stated that she had picked up  
5 the currency "from some guy off of Newell Street." The currency  
6 seized from the Passat is not the subject matter of this civil  
7 forfeiture action.

8 14. At approximately 8:30 p.m., state court search  
9 warrants were obtained for the Los Angeles Residence, the Garden  
10 Grove Residence, and the Camaro. At the Garden Grove Residence,  
11 the investigators searched the Camaro (which was situated at the  
12 residence) and seized approximately 18 kilograms of cocaine and  
13 4 kilograms of heroin. Three firearms were seized from inside  
14 the Garden Grove Residence itself. The search of the Los  
15 Angeles Residence occurred at approximately 10:30 p.m. During  
16 the search of the Los Angeles Residence, the investigators  
17 seized six firearms from various rooms throughout the Los  
18 Angeles Residence, the defendant currency (found in the bedroom  
19 of the Los Angeles Residence), and a large tub filled with  
20 marijuana. The Los Angeles Residence was occupied by Millar and  
21 Sun.

22 15. Based on the above, the government alleges that the  
23 defendant currency represents or is traceable to proceeds of  
24 illegal narcotics trafficking, was intended to be used in one or  
25 more exchanges for a controlled substance or listed chemical, or  
26 was used to facilitate one or more exchanges for a controlled  
27 substance, in violation of 21 U.S.C. § 841 et seq. The  
28 defendant currency is therefore subject to forfeiture pursuant

1 to 21 U.S.C. § 881(a)(6).

2 WHEREFORE, the United States prays that due process issue  
3 to enforce the forfeiture of the defendant currency, due notice  
4 be given to all interested parties to appear and show cause why  
5 forfeiture should be not be decreed, that this court decree  
6 forfeiture of the defendant currency to the United States of  
7 America for disposition according to law, and for such other and  
8 further relief as this court may deem just and proper, together  
9 with the costs and disbursements of this action.

10 DATED: December 30, 2015

EILEEN M. DECKER  
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LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division  
STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section

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16 FRANK KORTUM  
Assistant United States Attorney  
17 Asset Forfeiture Section

18 Attorneys for Plaintiff  
United States of America  
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VERIFICATION

I, JUSTIN R. ZAPANTA, hereby declare that:

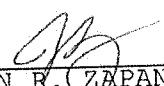
1. I am a Special Agent with the Drug Enforcement Administration and am the case agent for the forfeiture matter entitled United States v. \$45,357.00 in U.S. Currency.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed December 18, 2015 in Los Angeles, California.

  
\_\_\_\_\_  
JUSTIN R. ZAPANTA  
SPECIAL AGENT - DEA